

5. Ms. Wade previously filed her first Motion for Default Judgment and Memorandum in Support (ECF Nos. 9-10) on March 19, 2019.

6. On August 12, 2019, the Court entered an Order denying Plaintiff's Motion without prejudice and instructing her to move for default judgment by September 6, 2019.

7. On September 6, 2019, Ms. Wade filed her second Motion for Default Judgment and Memorandum in Support (ECF Nos. 15-16).

8. On September 15, 2020, the Court entered an Order granting Plaintiff's second Motion for Default Judgment (ECF No. 17).

9. Unbeknownst to Ms. Wade, Interworks had filed for bankruptcy in the Central District of California on July 9, 2019, without listing Ms. Wade as a creditor in its bankruptcy filings and or otherwise giving Ms. Wade notice that it had filed bankruptcy.

10. Because the September 15, 2019 Order of Default Judgment violated the automatic stay associated with Interworks' bankruptcy proceedings, Ms. Wade moved to set aside that judgment (ECF Nos. 18-19). The Court granted that motion on April 28, 2021 (ECF No. 20).

11. Ms. Wade subsequently submitted her proof of claim in Interworks' bankruptcy proceedings and obtained an order relieving her from the automatic stay so that she could continue the instant litigation against Interworks.

12. Ms. Wade now requests an entry of default judgment against Interworks and her bases for seeking such relief are more particularly stated in her Memorandum in Support of Third Motion for Default Judgment, which is incorporated herein by reference.

Accordingly, Ms. Wade requests that this Court enter default judgment against Interworks, and award her any other relief that this Court deems necessary and appropriate.

Respectfully submitted,
SHERI WADE

By: _____ /s/
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